



A civil society perspective on  
ambition, justice, and participation

# NDC UPDATES IN EECCA: FINDINGS FROM SELECTED COUNTRIES

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## TABLE OF CONTENTS

Introduction.....	4
Methodology .....	5
Regional Findings .....	6
Country Findings and Recommendations: From Paper to Action.....	8
Armenia .....	8
Azerbaijan .....	11
Belarus .....	14
Kazakhstan .....	16
Kyrgyzstan .....	18
Moldova .....	21
Comparative Overview of the NDC Update Status and Related Processes in the EECCA Countries .....	23
Conclusion.....	24



## INTRODUCTION

The first Global Stocktake ([GST](#)) made a clear conclusion: despite decades of negotiations, the world is far from limiting global warming to 1.5 °C. For many, this came as no surprise—civil society and scientists had already expressed concern about the slow progress made by governments. Nevertheless, this moment provided an opportunity to reassess priorities. The next round of Nationally Determined Contributions (NDCs), due in 2025, presents an important opportunity for reorientation. These documents will determine whether the world stays on track to limit warming to 1.5 °C or plunges deeper into the climate crisis. According to a report by the United Nations Environment Program ([UNEP](#)), countries must collectively reduce annual greenhouse gas emissions by 42% by 2030 and 57% by 2035. Otherwise, in just a few years, the Paris Agreement’s goal of keeping global temperature rise within 1.5 °C will become a mirage.

In Eastern Europe, the Caucasus, and Central Asia (EECCA) region, economic planning still relies heavily on fossil fuels. According to EU4Climate ([2021](#)), the share of renewable energy in final consumption remains low in most of the countries in the region, except for Moldova and Georgia (over 20%). Most countries depend on energy imports. Hydropower remains the primary source of renewable energy, while solar and wind play a minor role. For example, according to the International Energy Agency ([IEA, 2022](#)), Azerbaijan’s economy remains dominated by the oil and gas sector, which accounts for approximately 90% of exports and up to 50% of GDP, making the country one of the most heavily dependent on fossil fuels. The region continues to have high volumes of fossil fuel subsidies. According to the Organization for Economic Cooperation and Development ([OECD, 2022](#)), in 2020, the highest per capita subsidies were recorded in Azerbaijan (USD 104), while in Armenia, support amounted to only USD 4 per capita. More than 80% of all subsidies went to the natural gas and electricity sector, reflecting the dominance of gas in the energy balance of most countries in the region. Subsidies also remain in place in Belarus and Moldova, reinforcing dependence on fossil fuels and hindering investment in renewable sources.

4

Despite growing climate risks, the adaptation process in the region remains uncertain. Governance systems do not provide sufficient opportunities for communities, workers, women, and youth to participate in climate policymaking. At the same time, there is a growing gap not only between current commitments and scientific data, but also between the population and governments. In many countries in the region, citizens are losing faith that climate promises will be translated into real action, and the tools for participation in the development and implementation of climate policy are either unclear or completely absent. In Kyrgyzstan, for example, despite the creation of a Dialogue Platform involving the state, science, business, and NGOs ([Friedrich Ebert Foundation, 2021](#)), local community participation in climate policy remains extremely limited. Lack of transparency, complex procedures, and the absence of a methodology for public participation hinder the formation of truly people-centered NDCs. Women, children, and older people remain particularly vulnerable.

This document was prepared by the Working Group on the Analysis of NDCs in the EECCA region, which brings together representatives of civil society and members of the CAN EECCA network. The group was established in the spring of 2025 and worked to develop recommendations for state institutions and agencies responsible for developing new NDCs. The document includes regional trends and recommendations for individual countries (Armenia, Azerbaijan, Belarus, Kazakhstan, Kyrgyzstan, and Moldova). This analysis will reflect civil society’s view of how updated NDCs can serve as a tool for just transformation, while also identifying regional trends and barriers, and providing targeted recommendations for countries. The results of the analysis were used to prepare proposals addressed to government agencies responsible for updating NDCs.

## METHODOLOGY

The analysis covers six countries in the EECCA region (Armenia, Azerbaijan, Belarus, Kazakhstan, Kyrgyzstan, and Moldova). The selection of countries was based on the availability of data sources, the presence of CAN EECCA network partners, and the participation of representatives from these countries in the Working Group on UNFCCC Analysis.

The WWF [checklist](#) for assessing NDCs and CAN International's methodological [recommendations](#) serve as the basis for this assessment. This approach enabled the analysis to be structured in two ways: first, in terms of the level of climate ambition and energy transformation, and second, in terms of social justice, public participation, and institutional feasibility.

The key principle of the analysis is to consider NDCs not so much in terms of quantitative emissions indicators, but in terms of their potential to ensure a just transition, protect human rights, and address the needs of vulnerable groups.

## KEY AREAS OF ANALYSIS:

### Climate ambition

Alignment of national contribution targets with the global trajectory of limiting warming to 1.5 °C, presence of interim targets for 2030 and 2035.

### Energy

Strategies for phasing out coal, oil, and gas; plans for developing renewable energy; measures to improve energy efficiency and phase out fossil fuel subsidies.

### Adaptation, loss, and damage

Development of sectoral plans for agriculture, water resources, health care, and infrastructure; assessment of financial needs; measures to protect vulnerable regions and communities; mention of damage assessment mechanisms.

### Land use and agriculture

Accounting for emissions and removals in the land use, land-use change, and forestry (LULUCF) sector, transparency of methodology, targets for sustainable agriculture and forest conservation, and a link to food security.

### Human rights and public participation

Mechanisms for access to information: involvement of citizens, youth, and non-governmental organizations in the formation and implementation of NDCs, compliance with international conventions, and integration of human rights principles.

### Gender equality

Accounting for gender-differentiated impacts of climate policy, availability of gender-sensitive measures and indicators, and participation of women and vulnerable groups in decision-making processes.

### Just transition

Strategies to protect the employment and incomes of workers in carbon-dependent sectors, vocational retraining and social protection programs, and measures for the most affected regions.

### Monitoring and accountability

Legal framework for implementing the UNFCCC, distribution of responsibilities among institutions, transparent monitoring and reporting systems, involvement of independent experts, and society.

### Climate finance

Assessment of financing needs, plans to attract international resources, equitable distribution of funds, and protection of the interests of vulnerable groups.

## REGIONAL FINDINGS

6

At the time of preparing this analysis and recommendations (August 2025), only Moldova [had published](#) an updated NDC. Other countries in the region were in the process of developing updated documents. This is evidenced by the information from CAN EECCA network members participating in national working groups at state agencies, civil society representatives, experts, and responses to written inquiries.

Given that most countries have not adopted revised NDCs, the analysis considered the documents presently in effect. The recommendations presented are intended to be used as a guide for evaluating draft future updated contributions, as well as a basis for dialogue between government agencies and civil society.

In the EECCA region, the new cycle of NDC updates shows both progress and significant shortcomings. Although Armenia, Azerbaijan, Belarus, Kazakhstan, Kyrgyzstan, and Moldova are moving along different trajectories, together they present a narrative of commitments that is inconsistent with the urgent task of limiting global warming to 1.5 °C.

A closer look at individual country cases shows varied progress. Armenia pledges a [40%](#) reduction of emissions by 2030. However, the NDC document does not provide any substantial analysis or modeling to demonstrate that this target aligns with the domestic emissions pathway and would eventually support the global effort to limit the temperature increase to 1.5°C. Kazakhstan states its intention to achieve carbon neutrality by 2060, but the current NDC does not include interim targets for 2035, which are necessary to align with the 1.5 °C trajectory. The updated NDC should include such a target, along with specific steps to achieve it. The country's national economy remains [heavily dependent](#) on fossil fuels, with its energy balance primarily based on domestically produced coal.

Additionally, the region's vulnerability is exacerbated by its dependence on Russian energy supplies and infrastructure, which reduces incentives to reduce fossil fuel consumption. [Kyrgyzstan](#), which is less dependent on fossil fuel imports, uses a combination of coal and hydropower in its [energy mix](#). The country's current NDC contains quantitative climate targets but does not specify the concrete measures that will lead to their achievement. In addition, the document lacks a clear vision for adapting to the effects of climate change, including droughts, floods, and glacier melt, which directly threaten agriculture and water resources. The updated NDC should include specific mechanisms for implementing climate targets, as well as detailed adaptation plans that take into account key climate risks. Moldova has made progress in integrating equity and gender-sensitive approaches. However, NDC does not fully consider the harsh reality of the gradual phase-out of fossil fuels, omitting clear timelines and failing to reference the COP28 call for such a transition. Belarus serves as another striking example: although it officially reports a 57% emission reduction since 1990 for economic reasons, its targets of [-35% or -37%](#) do not require additional measures, reforms, or restrictions on fossil fuels or industrial activities, in fact allowing emissions to increase. The country effectively admits that it has no intention of taking real action to mitigate the effects, while disregarding human rights, public participation, and international environmental commitments.

All these national examples have common patterns. NDCs are rarely supported by transparent models and interim targets for 2035. None of them present credible strategies for phasing out fossil fuels, leaving the region entrenched in carbon-intensive systems. The reference to a just transition is more symbolic than practical. Workers, youth, women, and vulnerable communities are excluded from having a real influence on climate policy. Adaptation planning is also unrealistic, lacking concrete targets and indicators, despite the region's high vulnerability to droughts, floods, and glacier melt. Monitoring and accountability mechanisms in the region are poorly developed. Most countries lack a clear division of institutional responsibilities, a transparent system for assessing progress, and the involvement of independent experts.

Across the region, geopolitical instability is increasing dependence on fossil fuels, slowing decarbonization, and increasing vulnerability of communities on the front lines of the climate crisis. In aggregate, these findings reveal a worrying regional trend that needs to be addressed in the current update of commitments. Although NDCs exist on paper, they too often serve as declarations rather than credible roadmaps. The region risks falling into insufficient ambition, symbolic commitments, and deepening carbon dependence unless governments choose a different path — one that is ambitious, just, and grounded in climate science and realities of people's lives.

## COUNTRY FINDINGS AND RECOMMENDATIONS: FROM PAPER TO ACTION

### ARMENIA

At the time of preparing this analysis, Armenia's updated Nationally Determined Contribution (NDC) was still under development. Therefore, the assessment was based on the existing version submitted to the United Nations Framework Convention on Climate Change (UNFCCC) [Registry](#).

The current [NDC](#) of Armenia commits to reducing greenhouse gas emissions by 40% by 2030 compared to 1990 levels. However, this target does not align with a long-term low-carbon development trajectory consistent with the goals of the Paris Agreement. According to World Bank estimates ([2024](#)), to achieve its 2050 strategic objectives, Armenia would need to reduce emissions by around 65% by 2030 compared to 1990 levels.

Additionally, the NDC does not sufficiently incorporate the principles of equity and just transition, which are crucial for ensuring support to vulnerable groups during the transition to a low-carbon economy. This omission could undermine Armenia's ability to meet its climate commitments and to balance environmental sustainability with social justice.

#### 1. INSUFFICIENT ALIGNMENT WITH THE 1.5°C PATHWAY

Armenia's NDC sets a target of reducing greenhouse gas emissions by 40% by 2030 compared to 1990 levels (35% excluding the Land Use, Land-Use Change and Forestry sector). However, the document lacks modelling or scenario analysis to show that this target is consistent with an internal emissions reduction pathway or contributes to achieving the Paris Agreement objectives. No targets for 2035 are specified, and there is no comprehensive roadmap toward carbon neutrality.

According to the World Bank and Armenia's Long-term Low Emissions Development Strategy ([LT-LEDS](#)), the country has set a goal of achieving climate neutrality by 2050. To remain on this trajectory, Armenia would need to reduce emissions by approximately 65% by 2030, which is far more ambitious than the currently declared 40%.

#### RECOMMENDATION:

**Armenia should update its NDC to include development scenarios backed by transparent modelling that demonstrates alignment with the 1.5°C pathway. It would also be advisable to set an intermediate 2035 target and enshrine a commitment to achieve carbon neutrality by 2050 in line with the national LT-LEDS.**



## 2. LACK OF A PLAN FOR PHASING OUT FOSSIL FUELS

The energy sector remains vulnerable: about [90%](#) of natural gas is imported from Russia, and the Metsamor nuclear power plant supplies a significant share of electricity. The current NDC lacks a strategy for phasing out fossil fuels. Meanwhile, according to the World Bank, with investments of around [USD 3 billion](#), the share of renewable energy could reach 39% by 2030 and 53% by 2050, confirming a strong potential for energy diversification.

Despite heavy reliance on fossil fuel imports, Armenia has not yet announced any plans for a gradual phase-out. The NDC does not reference the COP28 [decision](#) calling for a “phasedown of fossil fuels” and provides no timeline for such a transition.

Without a clearly formulated strategy for phasing out fossil fuels, and with continued reliance on technologies that prolong fossil use (such as nuclear energy or carbon capture), the energy transition risks becoming prolonged and costly.

### RECOMMENDATION:

**The updated NDC should include a phased plan for the phase-out of fossil fuels and a gradual reduction in dependence on imported gas. It should also establish targets for the expansion of renewable energy in line with international projections.**

9

## 3. INSUFFICIENT INTEGRATION OF CLIMATE JUSTICE AND JUST TRANSITION

The current NDC does not adequately reflect the social consequences of climate policy. While it highlights the importance of public participation and gender-sensitive consultations, it lacks an analysis of the social impacts of the transition or a clear strategy for achieving a just transition. Without compensatory measures, climate change may deepen rural poverty and exacerbate social inequality. International just transition frameworks — the [preamble](#) to the Paris Agreement, the International Labour Organization’s [Guidelines](#) for a Just Transition, the [Silesia Declaration](#), and the Climate Action for Jobs [initiative](#) — emphasize the need to safeguard vulnerable groups, create re-skilling opportunities, and ensure access to decent jobs.

### RECOMMENDATION:

**The updated NDC should integrate just transition principles, including protecting employment and incomes, creating green jobs, developing reskilling programs, and providing social support to communities dependent on carbon-intensive sectors.**

#### 4. GAPS IN ADAPTATION AND LOSS AND DAMAGE MECHANISMS

Armenia is already facing growing risks: droughts are reducing agricultural yields, melting glaciers threaten long-term water supply, and extreme rainfall and flooding damage roads and energy infrastructure. However, the current NDC lacks a systemic adaptation plan to address these threats.

Although Armenia has developed a National Adaptation Plan (NAP), it requires significant improvement. The plan does not include sector-specific adaptation targets for agriculture, water resources, or infrastructure, nor does it outline clear financing mechanisms to support implementation.

Loss and damage, a critical issue given rising climate risks in the region, is absent from the NDC. This omission hampers Armenia's ability to respond effectively to climate impacts and limits access to international climate finance under the UNFCCC. To qualify for such support, including from the Loss and Damage Fund, Armenia needs to systematize data on climate impacts and identify adaptation priorities.

##### **RECOMMENDATION:**

**The updated NDC should include a detailed plan of adaptation measures, an assessment of financing needs, and mechanisms for mobilizing resources from international funds, including the Loss and Damage Fund.**

#### 5. FRAGMENTED LEGISLATIVE AND ADMINISTRATIVE FRAMEWORKS

10

Although the NDC refers to certain strategies, it lacks a solid legislative foundation for implementing commitments. There is no clear implementation timeline or mechanism for public oversight. Disaggregated data needed for assessing impacts and participation are insufficient. Without robust governance mechanisms, climate targets risk remaining purely declarative.

##### **RECOMMENDATION:**

**The updated NDC should provide for the creation of transparent monitoring and reporting mechanisms and institutionalize the participation of civil society and independent experts in climate governance.**

## AZERBAIJAN

At the time of analysis (August 2025), Azerbaijan is still in the process of developing its updated Nationally Determined Contribution ([NDC](#)). This analysis is based on the latest submitted version, represented by the second updated NDC (October 10, 2023).

Azerbaijan's current NDC sets a 40% GHG reduction target by 2050, but does not align with the 1.5°C temperature goal or the country's fair share of the global carbon budget. The NDC lacks near-term milestones (e.g., for 2030), a net-zero commitment, scientific modelling, and references to the remaining carbon budget. It also omits an assessment of historical responsibility or equitable effort-sharing.

The absence of a fossil fuel phase-out plan and continued silence on [subsidy](#) reform further undermines its credibility. The social dimension of climate action remains underdeveloped, with no clear strategy to support affected workers or vulnerable groups.

Vague references to "market mechanisms" raise additional concerns about the overuse of offsets in place of actual domestic emission reductions. Without a detailed implementation roadmap and clearly defined institutional responsibilities, the NDC may remain aspirational rather than actionable.

The following recommendations aim to address these gaps and support Azerbaijan in strengthening its NDC.

### 1. INSUFFICIENT ALIGNMENT WITH THE 1.5 °C PATHWAY

Although Azerbaijan has set a target to reduce greenhouse gas emissions by 40% by 2050, it does not provide a clear action plan or scientific modelling to confirm that this target is consistent with the goal of limiting global temperature rise to 1.5 °C. The document does not include references to the [remaining](#) global carbon budget or interim targets (e.g., for 2035). It also does not have a clear mechanism for reviewing or updating targets over time.

11

#### RECOMMENDATION:

**Azerbaijan should clarify how its emissions targets are consistent with the 1.5°C scenario by including transparent modelling, setting short- and medium-term milestones (e.g., by 2035), and committing to achieving net-zero emissions. The NDC should also include a review mechanism in line with the GST cycle to ensure accountability and progressiveness of ambition.**

### 2. LACK OF A PLAN TO PHASE OUT FOSSIL FUELS

Despite their strategic and economic importance for Azerbaijan, the current version of the NDC does not set out any plan to phase out fossil fuels. There is also no mention of subsidy planning that should be part of the fossil fuel phasing-out strategy.

#### **RECOMMENDATION:**

**Azerbaijan should include a timeline and strategy for phasing out fossil fuel production and use, particularly in the energy sector. This should include commitments to phase out fossil fuel subsidies and reallocate resources to renewable energy sources, measures to strengthen energy efficiency, just transition programs for industries and communities affected by the phase-out of fossil fuels, and sustainable infrastructure.**

### **3. LIMITATIONS OF THE JUST TRANSITION APPROACH**

Although the NDC acknowledges the vulnerability of certain groups, it lacks a comprehensive strategy for a just transition. There are no detailed plans to support affected workers, regions, or sectors, or to involve social partners or civil society in shaping the transition. Additionally, the document does not provide disaggregated data needed to assess the impact of climate policies and the vulnerability of different population groups to climate-related risks.

#### **RECOMMENDATION:**

**The NDC should include a just transition strategy that assesses the impact on the social and labor sectors. It is important to provide practical measures, such as government retraining programs for workers in carbon-intensive sectors, social protection schemes (e.g., temporary financial support and health insurance), and the creation of new jobs in renewable energy, together with sustainable infrastructure. It is important to place emphasis on supporting women and rural households through access to finance, training, and employment incentives. To coordinate actions and monitor impacts, the government should establish a Just Transition Working Group involving ministries, trade unions, and civil society to ensure the participation of affected communities in decision-making.**

12

### **4. RELIANCE ON POORLY DEFINED COMPENSATION MEASURES OR TECHNOLOGIES**

The document does not mention carbon dioxide removal or carbon capture and storage, but it does make indirect references to broad terms, such as “innovative technologies” and “market mechanisms.” This creates uncertainty about potential reliance on compensation measures or unproven technologies.

#### **RECOMMENDATION:**

**Azerbaijan should clarify the role of market mechanisms or technological compensation in achieving its targets, ensuring they do not substitute for real emissions reductions. The NDC should prioritize domestic mitigation measures and avoid excessive reliance on offsets.**

## 5. WEAK INTEGRATION OF ADAPTATION PLANNING AND LOSS & DAMAGE APPROACHES

While the NDC acknowledges Azerbaijan's vulnerability to climate impacts, it lacks detailed adaptation goals across key sectors such as water, health, agriculture, and infrastructure. It does not quantify adaptation financing needs, nor does it reference losses and damage - both economic and non-economic - already affecting climate-sensitive regions.

### RECOMMENDATION:

**The NDC should include sector-specific adaptation targets supported by indicators and clearly defined timelines. It should assess and communicate national adaptation finance needs, as well as acknowledge loss and damage as a distinct pillar of climate action. It is necessary to strengthen integration with the National Adaptation Plan and consider the submission of Adaptation Communication under the Paris Agreement.**

## 6. PARTICIPATION, HUMAN RIGHTS, AND GENDER EQUITY GAPS

The NDC refers to social justice and vulnerable groups, but it does not provide a formal mechanism to ensure the participation of women, youth, persons with disabilities, or rural communities in the development or implementation of climate policies. Gender considerations are mentioned only in the context of consultation, missing cross-sectoral integration.

13

### RECOMMENDATION:

**The NDC should adopt a clear human rights and participation framework aligned with international standards. It should ensure direct involvement of affected groups in policy design, implementation, and monitoring. Gender equity should be mainstreamed across all climate actions, supported by gender-responsive budgeting and targeted measures to address structural barriers to participation.**



## BELARUS

At the time of analysis (August 2025), the latest document submitted is Belarus' second updated Nationally Determined Contribution ([NDC](#)), submitted on October 11, 2021. The following analysis examines this document's provisions and is intended to serve as a starting point for assessment and comparison with the future updated NDC draft, expected in the coming months.

Belarus's current NDC is neither ambitious nor proactive in reducing emissions. The targets set to reduce greenhouse gas emissions by [35 or 37%](#) 2030 are achievable without additional measures.

The country's climate policy is constrained by serious institutional barriers and human rights violations. Since 2020, the government of President Lukashenko has been suppressing the work of independent media and civil society. As of August 2025, at least [1950](#) NGOs and independent trade unions have been liquidated. Independent experts working on climate policy have been excluded from the process and forced to work in exile. At the same time, space for dialogue within the country has been shrunk to a minimum. As a result, climate policy does not consider participation, fairness, and transparency.

The Climate Performance Index ranked Belarus [56th](#), classifying the country as an ineffective performer in the categories of "Renewable Energy" and "Climate Policy".

### 1. INSUFFICIENT ALIGNMENT WITH THE TARGET OF LIMITING GLOBAL WARMING TO 1.5 °C

Although Belarus claims a 35% reduction in emissions compared to 1990, the NDC does not explain how this target will contribute to the goal of limiting global warming to 1.5 °C or to the [remaining](#) global carbon budget. The document lacks modeling, interim targets (e.g., for 2035), and any mechanisms for reviewing or adjusting long-term targets. Independent models [show](#) that the country is capable of much more ambitious emissions reductions—up to 10% below 1990 levels by 2050—if it implements large-scale measures to phase out fossil fuels, electrify, and develop renewable energy sources.

14

#### RECOMMENDATION:

**Belarus should adopt truly ambitious targets that go beyond statistical reductions in emissions and ensure real, measurable reductions in greenhouse gas emissions. The NDC needs to be updated to include science-based scenarios and targets for 2035, as well as a roadmap for achieving carbon neutrality. To ensure credibility, the participation of independent experts and civil society needs to be restored.**

### 2. LACK OF A STRATEGY FOR PHASING OUT FOSSIL FUELS

Belarus does not have a coherent strategy for phasing out fossil fuels and remains dependent on natural gas and energy imports. Currently, about [60%](#) of electricity is generated from natural gas and [35-38%](#) from a nuclear power plant. Despite the decline in the share of gas, the energy system remains vulnerable due to the lack of diversified sources, the low share of renewable energy, and the continuation of subsidies for carbon-intensive industries. The scale of these subsidies remains unassessed.

#### RECOMMENDATION:

The updated NDC should include a strategy for the development of renewable energy sources, energy efficiency, and infrastructure modernization. Belarus should also assess and gradually reduce subsidies for fossil fuels. For coordinated management of the process, it would be advisable to adopt a National Energy and Climate Plan based on the experience of the European Union.

### 3. LACK OF A STRATEGY TO REDUCE EMISSIONS IN THE AGRICULTURAL SECTOR

The NDC primarily mentions agriculture as a sector related to adaptation, but its role in mitigating the effects of climate change is not clearly defined. Agriculture is responsible for more than [27%](#) of the country's greenhouse gas emissions. The description of agriculture as a "key area" remains ambiguous and is not backed up by specific targets for reducing emissions in this sector.

#### RECOMMENDATION:

Belarus should include targets for mitigating the climate impact of agriculture in the updated NDC, as well as specific measures to reduce emissions and increase sustainability, as part of its strategy for adapting Belarusian agriculture to climate change by 2050.

15

### 4. EQUITY, HUMAN RIGHTS, AND INCLUSIVITY PRINCIPLES ARE MISSING

Belarus' NDC demonstrates complete neglect of human rights, gender equality, and social justice. Since withdrawal from key conventions such as the Bern and Aarhus Conventions, the country has distanced itself even further from global standards, making it impossible to assess the fairness of its climate policy. To date, as far as is known, there are [eight](#) environmental activists among the political prisoners in places of deprivation of liberty, which underscores the link between authoritarian rule and the suppression of the environmental movement.

#### RECOMMENDATION:

The updated NDC should be aligned with international frameworks: the [Guiding Principles for a Just Transition](#) of the International Labour Organization and the [Silesian Declaration](#). Belarus should ensure the participation of workers, women, youth, and vulnerable groups in decision-making. In particular, it should establish a center for multilateral dialogue in the spirit of the Aarhus Convention. It is also necessary to integrate human rights protection mechanisms, including access to justice, independent legal assistance, and guarantees against persecution.

## KAZAKHSTAN

At the time of analysis (August 2025), the latest document submitted is Kazakhstan's second updated Nationally Determined Contribution ([NDC](#)) (June 27, 2023).

Despite ambitious plans to achieve carbon neutrality by 2060, Kazakhstan's NDCs are not fully consistent with the Paris Agreement's goal of limiting global warming to 1.5 °C.

The NDC lacks specific timelines for phasing out fossil fuels, a comprehensive just transition plan, and transparent and enforceable implementation and accountability mechanisms. The NDC also fails to cover certain sectors, such as land use, agriculture, finance, and gender-responsive planning.

At the same time, climate risks for the country are already becoming critical. The rate of warming in Kazakhstan [exceeds](#) the global and regional average. More frequent and severe droughts will exacerbate land degradation and desertification, while accelerated glacier melt will initially lead to increased river flow and flooding in the middle of the century, followed by a sharp decline. The frequency of mudslides threatening 156 settlements, including Almaty, will increase tenfold. These changes pose a particular threat to vulnerable and poorest segments of the population, making a just transition a key condition for preventing an increase in poverty and inequality.

### 1. LIMITED ALIGNMENT WITH THE 1.5°C TARGET

The NDC sets general decarbonization targets but does not explain the linkage between the emission reduction targets and the 1.5°C temperature pathway. The document does not provide modelling of domestic emissions, a quantitative assessment of the carbon budget, or an interim target for 2035. While the document indicates that the target is to be revisited in 2025, the long-term ambition remains unclear without a defined roadmap.

16

#### RECOMMENDATION:

**Kazakhstan needs to revise its NDC with a transparent, science-based approach to emission reductions, including a 2035 interim target and a clear linkage with the 1.5 °C pathway. These improvements should be informed by the assessment [results](#) of the GST.**

### 2. LACK OF A FOSSIL FUEL PHASE-OUT STRATEGY

The NDC does not describe the strategy of just and timely phase-out of fossil fuels. Such a strategy is necessary due to Kazakhstan's large fossil fuel sector and its impact on both national emissions and international markets.

#### RECOMMENDATION:

**Kazakhstan must develop and publish a fossil fuel phase-out strategy with clear sectoral timelines and investment plans for renewable energy sources. This roadmap should also take into account the socio-economic impacts of the transition and avoid lock-in to fossil fuel infrastructure.**

### 3. LACK OF A COMPREHENSIVE FRAMEWORK FOR A JUST TRANSITION

The NDC does not include a strategy for a just transition, it does not contain means of assessment of the social impact of climate policies on workers, communities, or regions that depend on fossil fuel-based industries, and communities that are most vulnerable to the impacts of climate change. Kazakhstan's long-term decarbonization efforts may disproportionately affect certain sectors and population groups unless a socially inclusive strategy is implemented.

#### RECOMMENDATION:

**Kazakhstan should include a just transition section in its NDCs, consistent with a human-centered approach in climate policies. This strategy should encompass retraining of workers, social protection, regional support programming, and civil society involvement.**

### 4. WEAK LAND USE AND AGRICULTURE ACCOUNTING

Kazakhstan's NDC mentions forest restoration and land reclamation, but does not make a clear distinction between emission reductions and removals in the land use sector. Moreover, the methodology is not sufficiently transparent. The agricultural sector, which significantly impacts national emissions and livelihoods, is not sufficiently addressed in the document.

#### RECOMMENDATION:

**Updated NDC should include separate and transparent accounting for the LULUCF sector and clearly defined targets for sustainable agricultural development. Forest and land use policies should be aligned with national biodiversity and adaptation targets.**

## KYRGYZSTAN

At the time of writing, Kyrgyzstan's updated Nationally Determined Contribution ([NDC](#)) was under development. The first updated contribution was submitted to the United Nations Framework Convention on Climate Change (UNFCCC) Registry on October 9, 2021. In the absence of an updated version, the assessment is based on the current 2021 document, as well as national strategies and available data.

Kyrgyzstan's energy sector is relatively small, with 78% coming from hydropower. In normal hydrological years, hydropower accounts for up to [90%](#) of domestic electricity production. This high dependence enhances a country's vulnerability during periods of water shortage. For example, in 2015–2016, hydropower production fell by 13.6%, leading to widespread power cuts in winter and an increase in expensive electricity imports.

Given that the average annual temperature increased by 1.3 °C between 1992 and 2021, and that droughts, floods, and landslides are occurring more frequently, the risks associated with climate change in Kyrgyzstan have significantly intensified. Extreme heat is becoming more frequent, in Jalal-Abad, it was observed on almost 90% of days in the summer of 2024. Extreme heat poses a threat to health, especially for older people, and increases mortality among people with cardiovascular and other chronic diseases. These realities must be taken into account when updating the NDC and developing a climate change adaptation plan.

### 1. WEAK ALIGNMENT WITH THE 1.5°C PATHWAY

Kyrgyzstan's current NDC does not provide a clear picture of the extent to which its contributions will help achieve the goal of limiting temperature rise to 1.5 °C. Although the NDC outlines ways to reduce emissions, it does not refer to climate modeling based on scientific data or data on Kyrgyzstan's remaining global carbon budget. To ensure that the targets do not remain mere aspirations, the document should include a schedule for revising the targets or a schedule for achieving net-zero emissions.

18

#### RECOMMENDATION

**Kyrgyzstan should clearly align its updated NDC with the 1.5°C pathway. This includes presenting a designed model of emission reduction trajectories and commitments to achieve net-zero emissions, preferably by 2050. Short-term targets for 2035 should be added in line with the results of the GST.**

### 2. LACK OF A COMPREHENSIVE STRATEGY FOR A JUST TRANSITION

Although Kyrgyzstan's NDC mentions employment and training opportunities in low-carbon sectors, it lacks a clear concept for managing the social and economic consequences of climate change measures. Climate change will disproportionately affect vulnerable groups, exacerbating poverty and social inequality. The most serious threat is droughts, which most often affect the poorest segments of the population who depend on agriculture. Women and low-income rural residents are most at risk from flash floods and landslides. The lack of a systematic approach to protecting employment and creating green jobs threatens social stability.



**RECOMMENDATION:**

**Kyrgyzstan should incorporate a just transition strategy into its NDC. It should outline plans for social protection, retraining, regional support, and community resilience. Civil society representatives should be actively involved in developing this strategy.**

**3. OVERDEPENDENCE ON LAND-BASED MEASURES AND LACK OF CLARITY IN AGRICULTURAL PLANNING**

Agriculture remains one of the most vulnerable sectors. Despite its declining share of GDP, it accounts for more than 14% of national output and employs more than [25%](#) of the economically active population. The main products are cereals, fodder crops, meat, and dairy products. Agriculture is already affected by droughts and extreme weather events, which [increases the](#) risk of food insecurity. Although the NDC contains general references to reforestation, forest protection, and sustainable agriculture, it does not make a clear distinction between emissions reduction and sequestration, nor does it provide methodologies for tracking land use change and overall land use accounting. The agricultural sector is not sufficiently covered, as there is limited information on mitigation opportunities and adaptation needs.

**RECOMMENDATION:**

**Kyrgyzstan should submit a transparent accounting methodology for the land sector in accordance with the [recommendations](#) of the UNFCCC. The NDC should clearly distinguish between reductions from fossil fuel combustion and removals from land use and include specific targets and policy measures for climate-resilient agriculture.**

19

**4. LIMITED INTEGRATION OF ADAPTATION PRIORITIES AND LOSS AND DAMAGE PROGRAM OF ACTION**

Kyrgyzstan is already experiencing extreme weather events: glacier melt threatens long-term water supplies, droughts and floods destroy infrastructure, and an increase in hot days increases mortality and the burden on the health system. The National Adaptation Plan (NAP), [discussed](#) in March 2025, encompasses key sectors including agriculture, health, emergency management, biodiversity, energy, and sustainable urban development. However, it has not yet been integrated into the country's climate goals. There is also no mention of a program of action on loss and damage, despite the country's vulnerability to climate disasters.

**RECOMMENDATION:**

**The updated NDC should include provisions from the NAP, identify specific measures for key sectors, and provide mechanisms for accessing international financing, including the Loss and Damage Fund.**

## 5. INSUFFICIENT ATTENTION TO GENDER EQUALITY AND HUMAN RIGHTS

Kyrgyzstan has formally committed to achieving the Sustainable Development Goals (SDGs), including SDG 5, which aims to achieve gender equality and empower all women and girls. National strategies provide for the integration of gender aspects into all policy areas, and by 2024, [88.9%](#) of the legal framework for promoting and protecting gender equality will be formally in place. However, according to [data](#) from UN Women, more than half of the data needed for monitoring is still unavailable. Although the NDC mentions measures to raise public awareness and access to information, the document does not contain a gender analysis or mention the rights of vulnerable groups. There is no mention of gender-responsive policies or the participation of indigenous peoples or marginalized groups in either the planning or implementation processes. In Kyrgyzstan, the Climate Change Dialogue Platform was established in [2014](#) as a multi-stakeholder initiative involving the state, academia, business, and non-governmental organizations. Such an initiative should continue for the NDC update process.

### RECOMMENDATION:

**The updated NDC should take into account gender aspects and human rights by including gender-disaggregated indicators, social integration measures, and mechanisms for the active participation of all groups. References to the international legal framework on human rights and gender equality should be added to ensure consistency with the SDGs. In addition, the updated NDC should provide for systematic participation of the public and local communities and institutionalize the Dialogue Platform as a mechanism for coordination and dialogue. This will increase trust and make climate policy more people-centered.**

## MOLDOVA

At the time of the analysis (August 2025), Moldova was the only country in the region to submit an updated Nationally Determined Contribution ([NDC](#)) to the Registry of the United Nations Framework Convention on Climate Change (UNFCCC) on May 6, 2025. Moreover, in April 2024, Parliament approved [a law](#) on climate change, setting a course for achieving climate neutrality by 2050 and establishing a system of interim targets and instruments (CO<sub>2</sub> pricing, emissions monitoring, and verification, sectoral decarbonization). These steps make Moldova a regional leader in the development of modern climate legislation synchronized with the European framework (Green Deal, European Climate Law). The law also provides for the creation of a National Commission on Climate Change and the development of a National Integrated Energy and Climate Plan.

At the same time, the government is focusing on the energy efficiency of the housing stock as a socially just solution during the transition. However, this is not specified as a tool for a just transition in the updated NDC.

In addition, given its geographical characteristics, Moldova is at substantial risk of flooding and forest fires (more than [73%](#) of forested areas are classified as highly vulnerable). This requires the integration of adaptation into the NDC with specific targets, indicators, and financial mechanisms.

### 1. LACK OF CLEAR COMMITMENTS TO PHASE OUT FOSSIL FUELS

The NDC lacks a roadmap for phasing out fossil fuels (phasing, timelines, sectoral trajectories) that is synchronized with the COP28 decision on the gradual phase-out of fossil fuels. At the same time, the consumer support system has historically [included](#) direct transfers to end users of gas. Despite increased transparency (data on subsidies are [available](#) in the OECD Inventory of Support Measures to Fossil Fuels), maintaining such schemes without reform hinders investment in renewable energy and energy efficiency.

21

#### RECOMMENDATION

**The updated NDC should also include a roadmap for phasing out fossil fuels, specifying the timing and stages of reducing fossil fuel consumption across various economic sectors. Moldova should refer to the COP28 decision and specify how it will redirect investments towards renewable energy sources and energy efficiency improvements.**

### 2. INSUFFICIENT PRIORITIZATION OF JUST TRANSITION IN EMISSIONS REDUCTION, ADAPTATION, AND FINANCING MEASURES

References to a just transition in the document are largely symbolic: mechanisms for the participation of workers, youth, women, and vulnerable groups are not specified. Civil society outside Chisinau has [limited](#) institutional capacity (short grant cycles, lack of resources, intermediation by capital city NGOs), which reduces the legitimacy and quality of climate policy. Furthermore, a just transition is not integrated into adaptation planning, financial needs assessments, or other measures.

## RECOMMENDATION

Moldova should include just transition as a cross-cutting principle integrated into all components of NDC, such as mitigation, adaptation, climate finance, and implementation. This should also include an assessment of the impact on employment in the energy and land use sectors, as well as the impact on vulnerable regions and communities. It is essential to ensure equitable access to climate finance and the protection of the most vulnerable groups and communities living in areas most exposed to the climate crisis. In addition, the UNFCCC should institutionalize social dialogue (trade unions, youth and women's organizations, local communities).

### 3. INSUFFICIENT DATA ON SOCIAL EQUITY AND UNDERDEVELOPED MECHANISMS OF ACCESS TO JUSTICE

The NDC of Moldova refers to gender-sensitive and participatory approaches, and the National Climate Change Adaptation Program encourages disaggregation of data by sex, age, and vulnerability. However, the wording is of a recommendatory rather than a binding nature. This reduces the effectiveness of NDC assessment. The NDC does not mention any system to ensure the consistent collection and use of such data in adaptation or mitigation planning. Similarly, while rights-based language is used in national strategies, there are no clearly defined mechanisms for access to justice in cases of climate-related rights violations, such as forced displacement, pollution, or exclusion from decision-making. As a result, the NDC risks remaining a declarative document rather than serving as a practical guide for effective climate policy.

22

## RECOMMENDATION

Moldova should institutionalize the collection and use of disaggregated data on all components of the NDC, ensuring that climate policies consider the differentiated impacts on women, youth, older persons, and persons with disabilities. Simultaneously, the government should establish or refer to specific mechanisms for access to justice, including legal aid, complaint mechanisms, and remedies for people affected by climate damage. These elements are necessary to uphold human rights, ensure accountability, and implement truly inclusive climate measures.

**Table. COMPARATIVE OVERVIEW OF THE NDC UPDATE STATUS AND RELATED PROCESSES IN THE EEC CA COUNTRIES**

COUNTRY	STATUS OF THE UPDATE OF THE NDC	CIVIL SOCIETY PARTICIPATION	TRANSPARENCY OF THE PROCESS (CONSULTATIONS, DATA, REPORTING)
ARMENIA	Update in progress, updated version not yet submitted	Participation and gender-sensitive approaches are mentioned. Clear mechanisms are not identified	No modeling, interim target for 2035, or roadmap
AZERBAIJAN	Update in progress, no interim targets or modeling	No formalized mechanisms for the participation of women, youth, and vulnerable groups	References to future strategies, but no implementation plan, and emphasis on market mechanisms.
BELARUS	Update in progress, updated version not submitted	Consultations with the public excluded; no mechanisms for participation or human rights guarantees	No roadmap, monitoring, or legislative framework; climate governance not defined.
KAZAKHSTAN	Update in progress, version not submitted	Lack of a just transition strategy, stakeholder participation is limited	No modeling, interim target for 2035, or accountability
KYRGYZSTAN	Update in progress, version not submitted	Mentioned informing, but there is no participation of vulnerable groups	No modeling, weak specifics on adaptation, loss, and damage
MOLDOVA	Submitted updated NDC (2025)	Gender-sensitive and participatory approaches are stated, but no mandatory procedures are prescribed	No systematic collection of disaggregated data and mechanisms for access to justice



## CONCLUSION

The history of the EECCA region is defined not by failures, but by choices. Today, governments face a critical moment. They can continue to postpone ambitious targets, hiding behind fossil fuel dependency, opaque governance, and geopolitical conflicts. Or they can assume leadership. Such leadership means aligning policies with scientific evidence, developing just transition pathways that protect people, and opening decision-making to communities who will have to live with the consequences.

The history of numerous initiatives demonstrates that ignoring societal voices leads to weak and unstable policies that remain superficial and often only on paper. A bottom-up approach can significantly raise ambition and give national contributions a fairer, more people-centered nature. The Paris Agreement explicitly recognizes that raising ambition requires the participation of Parties. But the involvement of non-Party stakeholders — civil society, local communities, indigenous peoples, cities, and businesses — is equally important. The GST under the Paris Agreement confirmed this, stressing that sustainable and just solutions must be based on meaningful participation and dialogue.

In the EECCA region, this is the only path that can make NDCs realistic, ambitious, and fair. Workers in vulnerable sectors, women, youth, experts, and local communities already have much to contribute. What is lacking is the political will of governments to treat representatives of civil society not as a procedural formality, but as equal partners in shaping a sustainable future.

The approaches of countries in the region differ significantly. Armenia and Moldova are gradually aligning their climate and environmental regulations with EU frameworks, implementing directives on industrial emissions and environmental liability, and developing tools to support the greening of small and medium-sized enterprises. At the same time, in Azerbaijan, the space for civil society remains extremely limited. Since 2015, numerous legislative amendments have led to the closure of international organizations and increased pressure on local NGOs. Belarus, having withdrawn from key international conventions, has further distanced itself from global standards, and its climate policy remains closed, lacking human rights and gender components.

The GST under the Paris Agreement has already shown how great the risk of inaction is and how urgent the need for higher ambition has become. In this context, high-quality and fair national contributions are not only a matter of international reputation and trust, but also a practical tool. For EECCA countries, which in most cases are recipients of international climate assistance, they provide an opportunity to attract greater financial resources for developing resilient infrastructure, preparing for climate-related extreme events, and protecting vulnerable communities.

